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September 22, 2021

Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

As directed by the Court's order by memorandum endorsement of August 24, 2021, ECF No. 7069, I write on behalf of Defendant Kingdom of Saudi Arabia ("Saudi Arabia") to bring the Court up to date on the status of the parties' efforts to propose redactions in accordance with the Court's November 24, 2020 order, ECF No. 6541. The Plaintiffs' Executive Committees ("Plaintiffs"), the Federal Bureau of Investigation ("FBI"), and Defendant Dallah Avco all join in this letter.

As set forth in the parties' previous letters of July 23, 2021, ECF No. 6977, and August 23, 2021, ECF No. 7068, Plaintiffs indicated during a meet-and-confer on July 12 that they intend to make a proposal concerning the treatment of the redactions for the deposition transcripts of Khalil Al Khalil and Osman Kaldirim, as well as other redactions more generally, and that they will likely seek relief from the Court on these issues. Additionally, Plaintiffs contend that in light of the FBI's recent admission that its subfile investigation is now closed, the FBI Protective Order should be lifted or substantially modified. Saudi Arabia, Dallah Avco, and the FBI will review and respond to Plaintiffs' proposal.

Saudi Arabia continues to prepare proposed redactions for Saudi Arabia's protected information in filings beyond those set forth in the Court's November 24, 2020 order and will supplement the list of outstanding filings for redaction review as appropriate.

The FBI continues to review proposed redactions to filings provided by the parties, as well as deposition transcripts recently provided for review under the FBI Protective Order. The FBI will consider any proposal offered by the Plaintiffs, but the FBI believes the FBI Protective Order will remain necessary. For example, the FBI Protective Order is necessary to protect the substantial amount of information in FBI records that is subject to the Privacy Act.

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Dallah Avco has reviewed the proposed redactions circulated to date. It takes no position on those redactions and does not itself propose any additional redactions.

Counsel for all parties will continue to work to move this process forward. Subject to the Court's approval, we propose to submit another joint status letter on or before October 22, 2021.

Respectfully submitted,

/s/ Michael K. Kellogg

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia

cc: All MDL Counsel of Record (via ECF)